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RECORD OF COMMUNICATION	<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY) _____		
(Record of item checked above)			
TO: Richard Burke, V.P. Riverport Terminal and Fleeting Co.	FROM: Michael O'Toole	DATE 12/12/83	TIME AM
SUBJECT U.S. EPA's Field Investigation Report			
SUMMARY OF COMMUNICATION <p>Burke wants a copy of the document. I will send him one today. He wants to know what EPA plans to do next. I will have me our attorney contact Frank Pellegrini 314/241-7445 and let him know.</p> <p>Burke wants to sell property to Pillsbury. He has a meeting scheduled for 12/15/83 with Pillsbury to discuss the sale. Because of the study results he doesn't think Pillsbury will buy the property.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED <p>Tom: call Pellegrini</p>			
INFORMATION COPIES TO: Tom Daggett			

DEC 1 2 1983

Listing of Monsanto Chemical Company as a Tier 3 Site

Milt Clark
Toxic Materials Branch

David Stringham, Deputy Director
Waste Management Division

Based upon the attached August 11, 1982, letter from Monsanto to Dr. Daniel Hryhorczuk, the Monsanto Chemical Company in Sauget, Illinois, would be classified as a Tier 3 Site, as 2,4,5-T was converted to a pesticide derivative.

A recent report by FIT on soil contamination below the Sauget/Sauget Landfill revealed the presence of 2,3,7,8-TCDD at 3.3 parts per billion. However, no 2,4,5-TCP or 2,4,5-T was found, only 2,4,6-TCP. This particular trichlorophenol would have a 2,4,7,9-TCDD as a contaminant. It is possible that the reporting laboratory for FIT confused these two dioxins. In any event, a follow-up analysis (isomer specific) of the soil sample in which the TCDD was found should be conducted. Tiernan's laboratory at Wright State would be recommended.

Attachment

cc: /W/Attachment)
M. O'Toole, 5HR
C. Hesse, 5HT

Monsanto

DEPARTMENT OF MEDICINE &
ENVIRONMENTAL HEALTH

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

August 11, 1982

Daniel Hryhorczuk, M.D.
University of Illinois
School of Public Health
P. O. Box 6998
Chicago, Illinois 60680

Dear Dr. Hryhorczuk:

I'm sorry for not giving a more prompt reply to your letter of June 16, but vacation schedules have intervened.

In response to your proposal, the production of chlorinated benzenes likely to form chlorinated dibenzo-p-dioxins (CDD's) or chlorinated dibenzofurans at our Sauget, Illinois plant is to the best of our knowledge as reported in Tiernan's book (DIOXINS, US-EPA-600/2-80-197), with the exception of ortho nitroanisole and 3,4-dichloroaniline which were not manufactured in the Sauget plant. In addition, 2,4,5-trichlorophenoxy acetic acid (2,4,5-T) was manufactured elsewhere and esterified at the Sauget, Illinois plant. I would suggest that Dr. Tiernan at Wright State might be a good source of additional information.

Tiernan classifies most of the compounds mentioned in your letter as having a low probability for CDD formation. With the exception of the orthochlorinated phenols, the molecules do not meet the criteria of having ortho-substitution and good leaving groups. In the case of the orthochlorinated phenols mentioned, with the exception of 2,4,5-trichlorophenol, the remaining substitution on the ring suggests that the major product of coupling would not be the most toxic 2,3,7,8-tetra-CDD. In any event, our process for production of ortho-, para- and 2,4-dichlorophenols, the only ones still manufactured at Sauget, is carefully controlled to minimize formation of CDD's and predioxins.

The 2,4,5-trichlorophenol was converted to 2,4,5-T outside of Illinois and transferred to the Sauget plant where it was esterified to the n-butyl ester. It's been over thirteen years since we've used 2,4,5-T as an intermediate at the Sauget plant, but because of the substituents suggesting that the 2,3,7,8-TCDD might have been formed in the 2,4,5-T process, we, along with a number of other companies, are cooperating fully in an epidemiology study being conducted by NIOSH relating to all phases of the discontinued chlorophenol processes, as well as conducting our own internal research. For your information, I have enclosed a process description and process chemistry

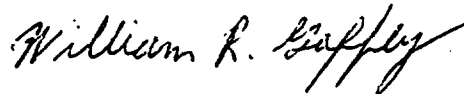
for the discontinued esterification process and the discontinued pentachlorophenol process at Sauget, Illinois. We are currently involved with five other defendants in litigation involving the 2,4,5-T esters and cannot disclose further detail during the course of this litigation on advice of counsel.

The polychlorinated biphenyls (PCB's) were manufactured at the Sauget plant up until 1977, at which time manufacture was discontinued. We have not found any of the CDD's in the PCB's manufactured by Monsanto Company nor have we seen any reports in the literature of such findings.

Production and end use of the chemicals you mention are as described by Tiernan, et al, and elsewhere in the literature. In dealing with Federal regulators, we have requested that production statistics remain secret and, on advice of counsel, cannot violate that request by disclosure to you. In the same vein, our waste disposal at the Sauget plant is involved in litigation with the State of Illinois. During the course of this litigation, our counsel advises us not to voluntarily disclose plant waste-related information.

I hope that we've been of some help to you in your endeavor.

Yours sincerely,



William R. Gaffey, Ph.D.
Manager, Epidemiology

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Enclosures

cc: C. F. Callis - B3CA
A. M. Ford - A2SA